

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

ERIC L. JEFFRIES,

Plaintiff,

vs.

**CENTRE LIFE INSURANCE COMPANY,
et al.**

Defendant.

Case No. C-1-02-351

(Judge Beckwith)
(Magistrate Judge Hogan)

**DEFENDANT'S PROPOSED
VOIR DIRE QUESTIONS**

The following proposed questions are submitted on behalf of Defendant Centre Life Insurance Company for use in the Summary Jury Trial.

Respectfully submitted,

S/William R. Ellis

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Attorneys for Defendants
Massachusetts Casualty Insurance Company
And Disability Management Services, Inc.

PROPOSED VOIR DIRE QUESTION NO. 1

Do any members of the jury panel, their family members or close acquaintances suffer from any of the following conditions:

1. Chronic Fatigue Syndrome;
2. Myalgic Encephalomyelitis
3. Fibromyalgia;
4. Myocitis

or any condition which cannot be objectively verified by medical testing.

PROPOSED VOIR DIRE QUESTION NO. 2

Does any member of the jury panel, their family members or close acquaintances suffer from any psychiatric, mental or emotional disorder?

PROPOSED VOIR DIRE QUESTION NO. 3

Are any members of the jury panel, their family members or close acquaintances currently disabled from employment?

PROPOSED VOIR DIRE QUESTION NO. 4

Are any members of the jury panel, their family members or close acquaintances, members and/or associated with the Aston Martin Club, the Jaguar Club of North America, the Ohio Valley Karting Association, the World Karting Association, the Hyde Park Country Club, or any other automobile, country or tennis club to which Mr. and Mrs. Jeffries belongs?

PROPOSED VOIR DIRE QUESTION NO. 5

Do any members of the jury panel, their family members or close acquaintances have any personal experience with, work for, or have ever had a claim against an insurance company or been involved in the evaluation or investigation of an insurance claim or the prosecution or investigation of a fraudulent insurance claim?

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been filed with the Court by electronic means on this 5th day of April 2004. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/William R. Ellis
William R. Ellis, Esq.

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